

## The VerStandig Law Firm, LLC

## INVOICE

9812 Falls Road, #114-160  
Potomac, MD 20854

Invoice # 10937  
Date: 06/24/2024  
Due On: 07/24/2024

Red River Subs, Inc.  
4434 4TH ST S  
MOORHEAD, MN 56560

### 00397-Red River Subs, Inc.

### Case Administration

Type	Date	Notes	Quantity	Rate	Total
Service	01/13/2024	E-mail copies of petition, schedules, depository account motion, and employment application to client, S. Wencil, and J. Krings, notifying latter two of case's filing	0.10	\$400.00	\$40.00
Service	01/14/2024	Continue drafting critical vendor motion (commenced drafting pre-petition)	0.40	\$400.00	\$160.00
Service	01/14/2024	Research and draft motion to stay state court litigation	1.50	\$400.00	\$600.00
Service	01/14/2024	Call with client re status of first day motions, need to draft budget, and anticipated timeline for filings	0.10	\$400.00	\$40.00
Service	01/14/2024	Exchange e-mails with T. Kapusta re terms of agreement for payment of retainer and monthly replenishments	0.10	\$400.00	\$40.00
Service	01/15/2024	Continue drafting cash collateral motion (commenced pre-petition), including review of budget and formatting of supporting exhibits	1.20	\$400.00	\$480.00
Service	01/15/2024	Review and revise critical vendor motion	0.40	\$400.00	\$160.00
Service	01/15/2024	Draft and file motion to expedite	0.30	\$400.00	\$120.00
Service	01/15/2024	Call with client to review budget for cash collateral motion	0.30	\$400.00	\$120.00
Expense	01/16/2024	Reimbursable expenses: Mail order setting first day hearings to matrix	1.00	\$66.99	\$66.99
Service	01/16/2024	Review court order on motion to expedite	0.10	\$400.00	\$40.00
Service	01/16/2024	Coordinate service of order granting in part, and denying in part, motion to expedite	0.10	\$400.00	\$40.00
Service	01/17/2024	E-mail to landlords and credit union attaching first day motions and court order expediting same	0.10	\$400.00	\$40.00

Service	01/19/2024	Attend hearing on first day motions and argue same	1.00	\$400.00	\$400.00
Service	01/19/2024	Calls with client (1 minute, 13 minutes and 11 minutes) to further prepare for first day hearings	0.50	\$400.00	\$200.00
Service	01/19/2024	Call with J. Krings re debtor financials, operations history, franchise norms for expense categories, and efforts to pinpoint areas where operations can be economically streamlined through reorganizational process	0.30	\$400.00	\$120.00
Service	01/19/2024	Review motions and exhibits in preparation for first day hearings, preparing outline for and notes for testimony to be adduced	1.20	\$400.00	\$480.00
Service	01/21/2024	Draft Section 1187 notice, review tax return to ensure SSNs are redacted, and file small business documents	0.30	\$400.00	\$120.00
Service	02/01/2024	Call with T. Beedy re keys to Bismarck location, [REDACTED] and credit union claims	0.20	\$400.00	\$80.00
Service	02/02/2024	Call with counsel for credit union re T. Beedy engaging personal counsel and next steps	0.10	\$400.00	\$40.00
Service	02/02/2024	Review order approving trustee retainer, draft check to trustee, draft cover letter, and send same to trustee via FedEx	0.10	\$400.00	\$40.00
Service	02/15/2024	E-mail to client in advance of meeting of creditors, updating as to negotiations with 25th St. landlord	0.10	\$400.00	\$40.00
Service	02/15/2024	Attend meeting of creditors	0.70	\$400.00	\$280.00
Service	03/05/2024	Attend status conference (telephonically)	0.10	\$400.00	\$40.00
Service	03/07/2024	Review proposed lease from M. Gust (counsel for Provident Partners), forward same to client for review and comment, and e-mail M. Gust re sections potentially needing attention or modification	1.40	\$400.00	\$560.00
Service	03/23/2024	Review bank statements and prepare January 2024 MOR	0.80	\$400.00	\$320.00
Service	03/23/2024	Review bank statements and draft February operating report	0.50	\$400.00	\$200.00
Service	04/30/2024	Call with T. Beedy re lease negotiations on Broadway, potential landlord-centric plumbing issue - and correlative concerns about a short-term building closure - in MN, discussions with franchisor, and information needed for MORs	0.40	\$400.00	\$160.00
Service	06/08/2024	Review client bank statements for March, April and May and draft operating reports for each month, creating running tally of financials in Excel to double-check veracity of numbers	0.90	\$400.00	\$360.00

Service	06/08/2024	E-mail to client re operating reports and forthcoming confirmation hearing	0.10	\$400.00	\$40.00
Service	06/09/2024	Review ballots, draft summary of same, check appropriate citations to Bankruptcy Code, and file same	0.40	\$400.00	\$160.00
				<b>Subtotal</b>	<b>\$5,586.99</b>

**00398-Red River Subs, Inc.****Plan and Disclosure Statement**

Type	Date	Notes	Quantity	Rate	Total
Service	04/08/2024	Begin drafting plan; Review docket and claims register in support of drafting	1.30	\$400.00	\$520.00
Service	04/11/2024	Call with T. Beedy re need to draft projections, factors to consider, general concepts underlying plan, and overview of claims register	0.50	\$400.00	\$200.00
Service	04/11/2024	Continue work on plan draft, including creation of supporting exhibits	2.40	\$400.00	\$960.00
Service	04/12/2024	Call with T. Beedy to review projections and draft plan, including detailed review of plan provisions, discussion of potential mark down of secured claim of credit union, discussion of interest rates, and discussion of whether or not there could be funds to pay general unsecured creditors	1.20	\$400.00	\$480.00
Service	04/12/2024	Review and revise plan and exhibits; Finalize and file same	1.80	\$400.00	\$720.00
Service	04/12/2024	Call with C. Stanley re treatment of landlord under plan	0.10	\$400.00	\$40.00
Service	04/12/2024	Call with J. Krings re provisions to be included in plan and franchisor's perspective on key issues	0.20	\$400.00	\$80.00
Service	04/12/2024	Call with T. Kapusta to preview portions of plan prior to filing	0.10	\$400.00	\$40.00
Service	04/12/2024	Call with S. Wencil to preview unusual component of plan prior to filing and solicit UST's input on same	0.10	\$400.00	\$40.00
Service	04/13/2024	Coordinate service of plan, scheduling order, and ballots; E-mail courtesy copies of ballots to counsel of record for Class 3 creditors	0.20	\$400.00	\$80.00
Service	04/13/2024	Draft certificate of service for plan, scheduling order, and ballots	0.20	\$400.00	\$80.00
Expense	04/15/2024	Mailing: Service of plan, ballots, and scheduling order	1.00	\$266.56	\$266.56

Service	05/13/2024	Call with C. Stanley re post-petition rent, client's position on plan, and status of balloting	0.10	\$400.00	\$40.00
Service	05/13/2024	Draft and file motion to extend deadline to assume/ reject nonresidential leases	1.80	\$400.00	\$720.00
Service	05/21/2024	Prepare and file exhibit list for confirmation hearing	0.20	\$400.00	\$80.00
Service	06/09/2024	Review objection from UST and notes from agreement with credit union; Draft amended plan, together with explanatory cover document, and file same	0.50	\$400.00	\$200.00
Service	06/09/2024	Call with T. Beedy re operating reports and forthcoming confirmation hearing	0.10	\$400.00	\$40.00
Service	06/13/2024	Attend confirmation hearing	0.20	\$400.00	\$80.00
Service	06/17/2024	Review confirmation order and amendment thereto; Review Sections 1191 and 1129 to per court's finding re non-consensuality	0.20	\$400.00	\$80.00
Service	06/23/2024	Coordinate service of confirmation order	0.10	\$400.00	\$40.00
Expense	06/24/2024	Mailing: Mailing of confirmation order	1.00	\$71.59	\$71.59
				<b>Subtotal</b>	<b>\$4,858.15</b>

## 00399-Red River Subs, Inc.

### Claims Administration and Objections

Type	Date	Notes	Quantity	Rate	Total
Service	01/23/2024	Review e-mail from C. Stanley re stub rent (de minimis time); Review case law in Eighth Circuit on partial months and Collier section discussing same (.6); Respond to e-mail (.1)	0.70	\$400.00	\$280.00
				<b>Subtotal</b>	<b>\$280.00</b>

## 00400-Red River Subs, Inc.

### Fee and Employment Applications

Type	Date	Notes	Quantity	Rate	Total
Service	01/14/2024	Draft motion to pay retainer to trustee in exchange for provision of additional time to pay admin claim under plan	1.10	\$400.00	\$440.00

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**Subtotal \$440.00**

**Total \$11,165.14**